Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of	)	
	)	
Reallocation of the 216-220 MHz,	)	WT Docket No. 02 - 08
1390-1395 MHz, 1427-1429 MHz,	)	RM-9267
1429-1432 MHz, 1432-1435 MHz,	)	RM-9692
1670-1675 MHz, and 2385-2390 MHz	)	RM-9797
Government Transfer Bands	)	RM-9854
	)	RM-9882

To: The Federal Communications Commission

COMMENTS OF SPACELABS MEDICAL, INC.

Spacelabs Medical, Inc. ("Spacelabs") hereby submits comments on the Notice of Proposed

Rulemaking ("NPRM") issued in the above-captioned proceeding .

As the Commission is aware, Spacelabs is a leading manufacturer of, inter alia, low power

wireless medical telemetry monitors that are used extensively in hospitals and other

healthcare facilities. These monitors are used primarily in the treatment of ambulatory

cardiac patients. Many of the monitors manufactured by Spacelabs, as well as by other

manufacturers, operate now on a primary basis in the 608-614 MHz portion of the Wireless

Medical Telemetry Service ("WMTS Bands"), authorized under Part 95 of the Rules .

As anticipated and documented in the record of the WMTS rulemaking proceeding, clinical uses

of wireless medical telemetry are increasing and the spectrum needs to support the

increasing number of concurrent users requires medical telemetry manufacturers to exploit

all portions of the WMTS bands, including the 1.4GHz bands already included under Part 95 of

the Rules and clarified recently in another Report and Order . Efficient use of this

spectrum and protection of WMTS-registered users from co-channel and adjacent channel

interference necessitates sensible and conservative service rules. Accordingly, Spacelabs is

pleased to have the opportunity to submit comments on the above captioned NPRM that relate

to these concerns.

1. SERVICE RULES COMMENTS FOR 1427-1429.5 MHz BAND

To reduce the likelihood of disruptive interference to medical telemetry, Spacelabs:

A. Opposes spectrum allocation of non-medical secondary telemetry operating in

the 1427-1429.5 MHz due to the incompatible nature of the high-powered mobile and fixed

incumbent transmitters with WMTS patient-worn devices.

B. Supports the FCC's conclusions that a "band swap" of the WMTS to primary in

1429.5-1432 MHz is in the public's interest in the 7 "carved-out" areas, if spectrum

re-allocation for current secondary incumbents (Section 52) is not feasible.

C. Recommends that if secondary non-medical telemetry in the 1427-1429.5 MHz

band is permitted, that it be restricted (Section 56) to fixed, utility

telemetry, operating

with a co-channel emissions mask that limits emissions measured 3 meters from a

WMTS-registered site to a field strength level currently proscribed by Part
15 of the Rules

(less than 500mV per meter).
D. Recommends that such secondary non-medical telemetry users be
licensed on a

site-by-site basis (Sections 59 and 60), and that the identification, locations, and

technical parameters (power, operating frequency, etc.) of such secondary
users be listed in

the WMTS Frequency Coordinator database.
E. Recommends that channelization (Section 69) applicable to WMTS
primary

spectrum allocation in the 1427-1429.5 MHz, permit flexibility for 25kHz,
50kHz, and 100kHz

spaced channels for narrowband systems, and the ability to aggregate channels to support

wideband systems for wireless medical telemetry (both of these approaches
are consistent

with the intent of Part 95 WMTS Rules).
F. Recommends service rules for non-medical telemetry operating in
the

1427-1429.5 MHz band that limits emissions into the adjacent band of 1429.5-1432 MHz to a

field strength level measured at 3 meters from a WMTS-registered site to
those levels

currently proscribed by Part 15 of the Rules (500 mvolts per meter), and
that limits the

maximum effective radiated power at the band edge (at 1429.5 MHz) to 1 watt.

2. SERVICE RULES COMMENTS FOR 1429.5-1432 MHz BAND
Spacelabs also recommends:
A. Creation of service rules for non-medical telemetry operating
in the

1429.5-1432 MHz band that limits emissions into the adjacent band of 1427-1429.5 MHz to a field strength level measured at 3 meters from a WMTS-registered site to those levels currently proscribed by Part 15 of the Rules (500 mvolts per meter), and that limits the maximum effective radiated power at the band edge (at 1429.5 MHz) to 1 watt (Sections 67 and 68).

B. Licensing of primary non-medical telemetry users be licensed on a site-by-site basis (Sections 59 and 60), and that the identification, locations, and technical parameters (power, operating frequency, etc.) of such primary users be listed in the WMTS Frequency Coordinator database.

3. SERVICE RULES COMMENTS FOR THE 1390-1395 MHz/1432-1435 MHz BANDS

Finally, Spacelabs recommends:

A. Site-by-site licensing for spectrum users in the 1390-1395 MHz/1432-1435 MHz bands (Section 30), and that as part of this licensing structure, grantors of licenses be required to notify the WMTS Frequency Coordinator prior to license grant.

B. Adoption of Part 27 of the Rules for service rules for 1390-1395 MHz/1432-1435 MHz bands for both fixed and mobile users (Sections 97, 98, 105).

C. Recommend the application of Part 27.50 (maximum power) and Part 27.53 (emissions limits) at a distance of 1 mile from a WMTS-registered site for both fixed and mobile users in the 1390-1395 MHz/1432-1435 MHz bands, and at distances

less than 1 mile

from such sites, that the received signal of these users when measured at
the

WMTS-registered site be no greater than that level which is present in a
transmitter

complying with Part 27.53 at 1 mile.

Respectfully submitted,
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